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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA, SOUTHERN DIVISION**
9

10 RB VENTURE PARTNERS LLC, a Nevada
limited liability company, and 19
11 ENTERPRISES LLC, a Nevada limited
liability company,

12 Plaintiffs,

13 vs.

14 MONTROSE HOLDINGS, LLC, a Puerto
Rico limited liability company; JOHN COTA
15 SMALL, also known as JOHN C. SMALL,
16 also known as JOHN SMALL, an individual,
and DOES 1 through 10, inclusive,

17 Defendants.
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Case No. 2:23-cv-02150-JAD-DJA

**UNOPPOSED MOTION TO EXTEND
THE DEADLINE FOR THE
DEFENDANTS TO FILE A RESPONSIVE
PLEADING TO PLAINTIFFS'
COMPLAINT**

19 Pursuant to Local Rules IA 6-1 and 7-1, Plaintiffs, RB Venture Partners LLC, and 19
20 Enterprises LLC("Plaintiffs") and Defendants Montrose Holdings, LLC; John Cota Small, also
21 known as John C. Small, also known as John Small, ("Defendants"), by and through their
22 respective undersigned counsel of record, stipulate, agree, and respectfully moves the Court to
23 extend the deadline for Defendants to file a responsive pleading to Plaintiffs' Complaint from
24 April 12, 2024 to May 3, 2024. Defendants Montrose Holdings, LLC; John Cota Small, also
25 known as John C. Small, also known as John Small, ("Defendants") do not oppose the motion.

26 Good cause exists to grant this unopposed Motion based on the following facts:

27 1. On December 28, 2023, Plaintiffs filed their Complaint and Jury Demand
28 ("Complaint") in the United States District Court for the District of Nevada. [ECF 1.]

1 2. Thereafter, the parties have engaged in settlement negotiations and, to allow the
2 parties sufficient time to continue in those discussions, Defendants have requested, and Plaintiffs
3 have agreed to, a three-week extension of the Defendant's deadline to respond to Plaintiffs'
4 Complaint.

5 3. This is the first request for an extension of time for Defendants to respond to
6 Plaintiffs' Complaint. This extension is provided as a professional courtesy to Defendants'
7 counsel, to facilitate on-going settlement discussions, and is not intended to delay the proceedings
8 for the administration of the case.

9 Dated: April 12, 2024

**WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP**

10
11 By: 

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Attorneys for Plaintiffs
RB VENTURE PARTNERS LLC, and
19 ENTERPRISES LLC

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19 **IT IS SO ORDERED:**

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21 _____
22 **UNITED STATES MAGISTRATE JUDGE**

23 DATED: 4/15/2024
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CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2024 a true and correct copy of **UNOPPOSED MOTION TO EXTEND THE DEADLINE FOR THE DEFENDANTS TO FILE A RESPONSIVE PLEADING TO PLAINTIFFS' COMPLAINT** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By Carolyn R Bott
Carolyn Bott, an Employee of
WOLF, RIFKIN, SHAPIRO, SCHULMAN &
RABKIN, LLP